

Kissner and Associates LLC

27778 Stirrup Way
Los Altos Hills, CA 94022

July 11, 2002

Ref: Docket FAA-2002-12261, Reduced Vertical Separation Minimum in Domestic United States Airspace

Dear Sir or Madam:

We are a small operator that flies extensively around the Continental U.S. In anticipation of the implementation of DRVSM (Domestic RVSM), we implemented the appropriate Service Bulletin from our airplane manufacturer, Cessna Aircraft. We received our Letter of Authorization (LOA) from the FAA for RVSM and used the airplane in RVSM airspace in the North Atlantic and Europe.

Our experience with the RVSM implementation has been entirely positive. It works well, and it is clear from using it in actual flight conditions that it provides significant additional utility to airspace management. It has also clearly affected our operating costs in a positive manner. We expect that the major costs associated with its implementation in our single aircraft operation will provide good financial returns in time and fuel savings.

We support implementation of DRVSM as early as practical. We understand the concerns of operators who have to face the significant implementation costs, but on balance, the more efficient utilization of airspace has enough public benefit interest immediately, and enough operator economic benefit eventually to be worth an early implementation. We support the proposed schedule on full implementation in December, 2004.

Sincerely,

Charles Kissner
General Manager